

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Response to the Court's April 30, 2024 Memorandum and Order Regarding Judge Wolfson's *Daubert* Opinion on General Causation.

3. Attached hereto as Exhibit 1 is a true and correct copy of NIH/NIEHS Environmental Factor, *Genital Talc Use May Be Linked To Increase Risk Of Ovarian Cancer—New Study By NIEHS Scientists Provides Compelling Evidence That Genital Talc Use Is Associated With*

And Increased Risk Of Ovarian Cancer (June 2024).

4. Attached hereto as Exhibit 2 is a true and correct copy of Stayner et al., *Carcinogenicity of Talc and Acrylonitrile*, Lancet (July 5, 2024).

5. Attached hereto as Exhibit 3 is a true and correct copy of IARC *Monographs Evaluate the Carcinogenicity of Talc and Acrylonitrile: Questions and Answers*, IARC Monographs, Vol. 136 (July 5, 2024).

6. Attached hereto as Exhibit 4 is a true and correct copy of the report by Health Canada, *Screening Assessment Talc* (April 2021).

7. Attached hereto as Exhibit 5 is a true and correct copy of the Deposition of Gregory Diette, M.D., MHS, dated June 19, 2024.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Deposition of Christian Merlo, M.D., dated June 14, 2024.

9. Attached hereto as Exhibit 7 is a true and correct copy of Katie M. O'Brien, et al., *Association of Powder Use in the Genital Area with Risk of Ovarian Cancer*, Journal of the American Medical Association (2020).

10. Attached hereto as Exhibit 8 is a true and correct copy of Katie M. O'Brien, et al., *Intimate Care Products and Incidence of Hormone-Related Cancers: A Quantitative Bias Analysis*, Journal of Clinical Oncology (2024).

11. Attached hereto as Exhibit 9 is a true and correct copy of Kemi Ogunsina, et al., *Association between Genital Talc and Douche Use in Early*

Adolescence or Adulthood with Uterine Fibroid Diagnosis, 229 Am. J. Obst. & Gyn. 665 (2023).

12. Attached hereto as Exhibit 10 is a true and correct copy of the EPA Final Rule, 89 Fed. Reg. 21970 dated May 28, 2024. Attached hereto as Exhibit 11 is a true and correct copy of the ASCO press release, *Study Finds Association Between Genital Talc Use and Increased Risk of Ovarian Cancer* (May 15, 2024)

13. Attached hereto as Exhibit 12 is a true and correct copy of Sean A. Woolen, et al., *Association between the Frequent Use of Perineal Talcum Powder Products and Ovarian Cancer: A Systematic review and Meta-Analysis*, 37 J. Gen. Intern. Med. 2526 (2022)

14. Attached hereto as Exhibit 13 is a true and correct copy Kenneth J. Rothman, *Six Persistent Research Misconceptions*, 29 J. Gen. Intern. Med. 1060, 1060 (2014)

15. Attached hereto as Exhibit 14 is a true and correct copy of the Expert Report of and Dr. Bernard Harlow, Ph.D. and Dr. Kenneth Rothman, Dr.P.H., dated November 15, 2023.

16. Attached hereto as Exhibit 15 is a true and correct copy of Katie O'Brien, et al., *The Association between Douching, Genital Talc Use, and the Risk of Prevalent and Incident Cervical Cancer*, 11 Nature 14836 (2021).

17. Attached hereto as Exhibit 16 is a true and correct copy of Mary K. Townsend, et al., *Cohort Profile: The Ovarian Cancer Cohort Consortium (OC3)*, 51 Int'l J. Epidemiology 73 at 13 (2022).

18. Attached hereto as Exhibit 17 is a true and correct copy of Gonzales, et al., *Douching, Talc and Risk Of Ovarian Cancer*, 27 Epidemiology 797 (2016).

19. Attached hereto as Exhibit 18 is a true and correct copy of *Retire Statistical Significance: More than 800 Signatories Call For and End of Hyped Claims and Dismissal of Possibly Crucial Effects*, 657 Nature 305 (2019).

20. Attached hereto as Exhibit 19 is a true and correct copy of Manuel Sanchez-Prieto, et al., *Etiopathogenesis of Ovarian Cancer: An Inflamm-aging Entity?*, 42 Gyn. Onc. Reports 101018 (2022).

21. Attached hereto as Exhibit 20 is a true and correct copy of Minh Tung Phung, et al., *Effects of Risk Factors for Ovarian cancer in Women with and without Endometriosis*, 118 Fertility and Sterility 960, 965 (2022).

22. Attached hereto as Exhibit 21 is a true and correct copy of Kathryn L. Terry, et al., *Genital Powder Use and Risk of Ovarian Cancer: A Pooled Analysis of 8,525 Cases and 9,859 Controls*, 6 Cancer Prevention Research 811 (2013).

23. Attached hereto as Exhibit 22 is a true and correct copy of Ross Penninkilampi, et al., *Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-Analysis*, 29 Epidemiology 41, 41 (2018).

24. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/ Michelle A. Parfitt

Michelle A. Parfitt